



CAMARINOS LAW GROUP

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A Member of the N.J. and N.Y. Bar

January 3, 2019

VIA ECF

The Honorable Michael A. Hammer
United States Magistrate Judge
King Fed. Bldg. & United States Courthouse
50 Walnut St., P.O. Box 999
Newark, New Jersey 07101-0999

Re: **Sinclair et al. v. Township of Mahwah et al.**
Civil Action No. 16-cv-01568-MAH

Dear Judge Hammer:

This office represents the Plaintiffs in the above-referenced action. In further review of the privilege issues pending before Your Honor, counsel of record have met and conferred on a proposed list of approximately 1/3rd of the documents listed in Defendants' privilege logs and have agreed upon the following documents as a representative sample of the privilege dispute to be submitted to the Court for an initial determination of same:

Mahwah Township Privilege Log (15)

Bates Stamp Nos. 239, 240-241, 265-266, 267-268, 269-270, 271, 276, 279, 280, 281-284, 295-298, 302-304, 305-306, and 323-325;

Laforet Privilege Log (11 items)

Item Nos. 25, 26, 27, 28, 29, 32, 33, 34, 35, 38, and 41; and

Batelli Privilege Log (4 items)

Bates Nos. 125, 129-130, 131 and 132-134

We remain available at the Court's discretion to further review this matter and confirm the status conference scheduled for January 22, 2019 at 11:30 a.m.

Respectfully submitted,

CAMARINOS LAW GROUP, LLC

/s/Michael D. Camarinos

Michael D. Camarinos, Esq.

cc: Zimmerer, Murray, Conyngham & Kunzier
Genova Burns LLC
Botta Angeli, LLC